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PAUL D. CEGLIA,

Plaintiff,

vs.

CIVIL ACTION NO. 10-CV-00569(RJA)

PLAINTIFF'S MOTION FOR A CONTINUANCE

MARK ELLIOT ZUCKERBURG and FACEBOOK, INC.,

Defendants.

- 1. On June 2, 2011, Defendants filed a motion to conduct discovery on an expedited basis (Dkt. No. 44) and, on June 17, 2011, Plaintiff Ceglia filed a cross-motion to conduct discovery on an expedited basis. (Dkt. No. 57.)
- 2. By Minute Order dated June 20, 2011, the Court set a briefing schedule on the Defendants' motion and Plaintiff's cross-motion and a hearing on the motions for June 30, 2011 at 2:00 p.m.
- 3. Subsequent to the June 20, 2011 Minute Order, Plaintiff filed a notice to substitute Lake APC for and in place of DLA Piper Gray Cary US LLP (Christopher P. "Kip" Hall, Carrie S. Parikh, Robert W. Brownlie, John Allcock, and Gerard A. Trippitelli), and Lippes Mathias Wexler Friedman LLP (Dennis C. Vacco, Kevin J. Cross, and Richard M. Scherer). (Dkt. No. 75.)
- 4. In addition to retaining Lake APC, Plaintiff is currently engaged in discussions with several nationally recognized law firms to lead this litigation. (See Declaration of Jeffrey A. Lake.)

given Plaintiff's expectation that he will imminently retain lead counsel, Plaintiff requires a short three (3) week continuance of the hearing on the motions for expedited discovery to allow the

In light of the fact that Lake APC was only retained vesterday, June 28, 2011, and

attorneys at Lake APC and the potential additional counsel sufficient time to become acclimated

with the case and prepare for the hearing on the motions for expedited discovery. (See Lake

Decl.)

5.

6. At approximately 1:40 p.m. EST, Jeffrey Lake of Lake APC called Orin Snyder,

Esq., counsel of record for Defendants, and requested that he stipulate to continue the subject

hearing for three weeks for the reasons set forth herein. Mr. Snyder refused to stipulate. (See

Lake Dec.)

7. This motion is not being brought for purposes of delay or any improper purpose

and no party will be prejudiced by the Court granting the relief requested herein.

WHEREFORE, Plaintiff Paul Ceglia, prays that the Court: (a) grant this motion, (b)

continue the hearing set for June 30, 3011, by three (3) weeks or for such time as the Court

deems appropriate, and (c) award such other and further relief as the Court deems equitable and

just.

JEFFREY A. LAKE, A.P.C.

By: s/ Jeffrey A. Lake

835 5th Avenue, Suite 200A San Diego, California 92101

(619) 795-6460

jlake@lakeapc.com

Attorneys for Plaintiff Paul

Ceglia

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